

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

IN RE:

PETER P. VEUGELER

**Case No.: 13-bk-10389-KSJ
Chapter 11**

Debtor.

APPLICATION TO RETAIN COUNSEL FOR DEBTOR-IN-POSSESSION

COMES NOW, PETER P. VEUGELER. (the “Debtor” or “Applicant”), as debtor-in-possession, hereby seek authorization to employ Kevin E. Mangum and the law firm of Mangum & Associates, P.A. (“M&A”) as its counsel in this case, *nunc pro tunc* to August 20, 2013, respectfully representing as follows in support:

1. On August 20, 2013 Applicant filed a petition for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”). No trustee having been appointed, the Debtor is operating as debtor-in-possession under §§ 1107(a) and 1108 of the Bankruptcy Code.

2. The Applicant desires to employ Kevin E. Mangum (“Mangum”) and Mangum & Associates, P.A. (“M&A”), pursuant to § 327(a) of the Bankruptcy Code, as its counsel.

3. M&A has been selected for the reason that M&A has considerable experience in matters of this nature and the applicant believes that it is well-qualified to represent the Debtor.

4. The professional services the firm is to render include:

(a) prosecute and defend any causes of action on behalf of the Debtor; prepare, on behalf of the Debtor all necessary applications, motions, reports and other legal papers;

(b) assist in the formulation of a plan of reorganization and preparation of disclosure statement;

(c) provide all other services of a legal nature.

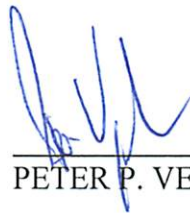
5. Because of the extensive nature of the services to be rendered, the Applicant desires to retain M&A under a general retainer.

6. To the best of the Debtor's knowledge, M&A neither holds nor represents any interest adverse to the estate. M&A is not a creditor of this estate.

7. The Applicant believes that the employment of M&A would be in the best interests of the estate.

WHEREFORE, the applicant requests the Court to authorize employment of Jeffrey S. Ainsworth, Kevin E. Mangum and the firm of Mangum & Associates, P.A. as attorneys for the debtor-in-possession.

Dated: Aug 20, 2013

A handwritten signature in blue ink, appearing to read 'P. Veugeler', is written over a horizontal line.

PETER P. VEUGELER

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing and the foregoing application was provided by hand delivery to the United States Trustee, 400 W. Washington Street, Suite 1100, Orlando, Florida 32801 this 28th day of August, 2013.

/s/ Kevin E. Mangum

Kevin E. Mangum, Esquire
Florida Bar No.: 904260
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Mangum & Associates, P.A.
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DECLARATION OF ATTORNEY FOR DEBTOR-IN-POSSESSION

Kevin E. Mangum, a shareholder in Mangum & Associates, P.A., submits the following statement in compliance with 11 U.S.C. Section 328 (a) and Section 329 (a) and F.R.B.P. 2014 and 2016.

1. I am admitted to practice law in the State of Florida and before this court.
2. I am a partner of Mangum & Associates, P.A. ("M & A"), 5100 Hwy. 17-92, Suite 300, Casselberry, Florida 32707.
3. No attorney in the firm of M & A is a relative of the debtor.
4. No attorney in the firm of M & A is a general partner or a limited partner of the partnership in which the debtor is also a general or limited partner.
5. The firm of M & A does not presently represent any creditors, any party to an executory contract of the debtors, or any person otherwise adverse or potentially adverse to the debtor or the estate on any matter, whether representation is related or unrelated to the debtor or the estate.
6. No attorney in the firm has previously represented a creditor, party to an executory contract or a person otherwise adverse or potentially adverse to the debtor or the estate, on any matter, substantially related to the Bankruptcy Case. There is no agreement of any nature, other than the shareholder agreement of the firm of M & A to the sharing of compensation for services performed and to be performed in this case. No attorney in the firm of M & A has any other connection with the debtors, creditors, or any other party in interest.

7. No attorney in the firm of M & A has any other interest, direct or indirect, which may effect proposed representation.

8. Kevin E. Mangum and Mangum & Associates, P.A. are "disinterested persons" as that term is defined under §101(14) and were not creditors of the Debtor at the time of filing.

9. Kevin E. Mangum has determined that the facts contained in this affidavit are true and correct.

10. I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct.

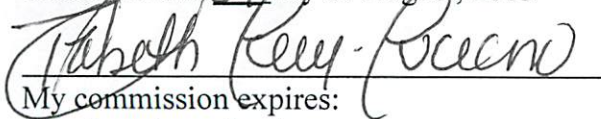
Dated: 8/26/13



KEVIN E. MANGUM, ESQUIRE
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E-mail: *Kevin@mangum-law.com*
Florida Bar No. 904260
Attorney for Debtor-in-Possession

SWORN TO AND SUBSCRIBED

before me this 26 day of August, 2013



My commission expires:

Elizabeth Levy-Luciano

Printed Name

Personally Known ☒ or Produced I.D. ☐

Type of I.D. Produced _____

